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Attorneys for Defendants Richard Spring, The Spring Family Trust, and The Jeanne T. Spring Trust

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

SIPA LIQUIDATION

Adv. Pro. No. 08-01789 (BRL)

-----x (Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

-----x

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PROCESS

PLEASE TAKE NOTICE, that Siegel, Lipman, Dunay, Shepard & Miskel, LLP, hereby enters their appearance as co-counsel of record with Katsky Korins LLP for defendants Richard Spring, The Spring Family Trust, and The Jeanne T. Spring Trust (the "Spring Defendants") in the above-captioned case, and, pursuant to Rules 2002, 9007 and 9010 of the

Bankruptcy Rules and Section 1109(b) of the Bankruptcy Code, demand that any and all notices given or required to be given and all papers served or required to be served in this case, be given to and served upon the undersigned law firm at the following address:

Kenneth W. Lipman, Esq.
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PLEASE TAKE FURTHER NOTICE, that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopier, telex or otherwise, which affect or seek to affect in any way the rights, claims or interests of the debtor with respect to the debtor or its estate.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the Spring Defendants' (i) rights to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) rights to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) rights to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses,

setoffs or recoupments to which the Spring Defendants are or may be entitled under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: Boca Raton, Florida
December 9, 2011

SIEGEL, LIPMAN, DUNAY, SHEPARD & MISKEL, LLP

By: /s/ Kenneth W. Lipman
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